

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 11 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
To Ensure Compatibility With Enhanced) RM-8143
911 Emergency Calling Systems)

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REPLY COMMENTS OF AMERITECH

I. Introduction

Ameritech respectfully submits these Reply Comments in the above-captioned matter, and generally voices its support for the "Wireless Industry Consensus"¹ document (hereinafter "IC document") and the process from which that document issued. However, since that document represents the views of only a segment of the wireless telecommunications industry rather than a true, industry-wide consensus, the Commission should be circumspect about adopting it as a statement of full agreement of all parties as to all issues. Specifically, since the IC document specifies some timeframes that are simply not feasible with existing technology, and since consensus has not been reached on several policy issues raised therein, the Commission should not adopt the document in its entirety.

By: Charles Reed
March 16, 1996

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¹ "Public Safety-Wireless Industry Consensus: Wireless Compatibility Issues," CC Docket No., 94-102, Public Notice, DA 96-108, rel. February 16, 1996.

II. The timeframes in the I/C Document may not be realistic.

As noted by PCIA, the IC document is nothing more or less than “the product of negotiations between representatives of the public safety community and a trade association representing the cellular telephone industry.”² Thus, a number of technical issues remain to be worked out and coordinated among the various entities involved. For example, the document’s proposed requirement that wireless providers present E911 systems, within 18 months, with full cell site information (using both a 7- or 10-digit “pseudo-ANI” and a 7- or 10-digit caller ANI) is not likely to be met given the fact that most existing CMRS providers networks are currently incapable of carrying both types of information simultaneously.³ These and other technical considerations on which debate is still open militate against mandating a specific deployment date for those items listed in the “Phase I” timetable as proposed in the document. A more realistic approach is suggested by those who urged the Commission to base its deployment requirements upon ongoing industry efforts and good-faith negotiations among all the parties involved.⁴ Ameritech urges reliance upon good faith

² Comments of PCIA, at 9.

³ Ibid.

⁴ See, e.g., the suggestion that “Phase I deployment should “be based entirely on good faith negotiations between public safety organizations, wireless carriers, and landline carriers” (Comments of U S West, at 4), and the proposal that deployment be undertaken “with the cooperation of PSAPs in the area” (Comments of SBMS, at 2-4). Ongoing efforts include the current TIA standards process which treats many such issues in a true consensus process.

negotiation among the parties instead of adopting an arbitrary implementation deadline agreed upon by only a few of the parties.

III. Any E911 surcharge adopted must be technology- and carrier-neutral.

Several parties noted that a cost-recovery method has yet to be established for the substantial costs to be incurred by virtue of E911 deployment.⁵ Until the significant issues associated with cost recovery are formalized and reduced to a fair means of apportionment among the many entities who stand to both incur and benefit from those costs, no industry-wide surcharge should be mandated by the Commission. Moreover, to avoid favoring any single technology or class of provider in the allocation of such costs, any further efforts to develop a so-called “surcharge” should be based on a policy of neutrality; e.g., in no event should the fees paid by the customers of wireless carriers exceed those paid by customers of wireline service providers. Absent such a “level playing field,” E911 deployment could unfairly advantage a particular type of service or class of service provider.

IV. Liability issues remain to be resolved.

As noted by several parties, the question of carrier liability for uncompleted or ineffective E911 connections is still to be resolved.⁶ Dropped calls, lack of channels, ANI transmission errors, and a number of other

⁵ Comments of SBMS, at 6; Comments of U S West, at 5; Comments of PCIA, at 8-9.

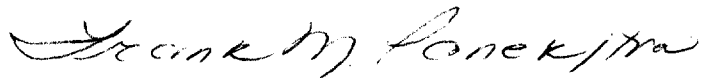
⁶ See, e.g., Comments of SBMS (at 7-9); Comments of PCIA (at 7-8).

potential problems which could impact the reliability and accuracy of the E911 data transmitted to PSAPs are arguably beyond the scope of this proceeding. Thus, carrier liability for problems such as these must be limited or shared in some rational manner. The Commission's approach to these issues remains crucial to the deployment of wireless E911 capabilities, and should be finalized as soon as practical to avoid delays in the availability of these important services to the public.

V. Conclusion

For the reasons set forth above, the Commission should refrain from adopting the IC document as written, and recognize that ongoing industry efforts offer the best means of issuing the successful, timely deployment of advanced E911 capability to the public.

Respectfully submitted,



Frank Michael Panek
Counsel for Ameritech
Room 4H84
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
(847) 248-6064

Dated: March 11, 1996

CERTIFICATE OF SERVICE

I, Deborah L. Simmons do hereby certify that a copy of the foregoing
REPLY COMMENTS OF AMERITECH has been served on the parties listed on
the attached service list, via first class mail, postage prepaid, on this 11th day of
March 1996.

By: Deborah L. Simmons / tre
Deborah L. Simmons

Bruce D. Jacobs
Glenn S. Richards
Stephen J. Berman
Attorneys for AMSC Subsidiary Corporation
Fisher Wayland Cooper
Leader & Zaragoza L.L.P.
2001 Pennsylvania Ave., N.W., Suite 400
Washington, DC 20006

Lon C. Levin
Vice President and Regulatory Counsel
AMSC Subsidiary Corporation
10802 Park Ridge Boulevard
Reston, Virginia 22091

Michael R. Bennet
Caressa D. Bennet
Attorneys for
Ad Hoc Rural Cellular Coalition
Bennet & Bennet, PLLC
1831 Ontario Place, N.W.
Suite 200
Washington, DC 20009

Alan R. Shark, President
American Mobile Telecommunications
Association, Inc.
1150 18th Street, N.W., Suite 250
Washington, DC 20036

Samuel A. Simon
Counsel for
Ad Hoc Alliance for Public Access to 911
901 15th Street, N.W., Suite 230
Washington, DC 20005

John Prendergast
Susan J. Bahr
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W.
Suite 300
Washington, DC 20554

John F. Beasley
William B. Barfield
Jim O Llewellyn
Attorneys for BellSouth Corporation
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

Charles P. Featherstun
David G. Richards
Attorneys for BellSouth Corporation
1133 21st St., N.W., Suite 900
Washington, DC 20036

Alejandro A. Calderon
President
Concepts to Operations, Inc. (CTO)
801 Compass Way, Suite 217
Annapolis, Maryland 21401

Andre J. Lachance
GTE Service Corporation
GTE Mobilnet Incorporated
1850 M Street, N.W.
Suite 1200
Washington, DC 20036

Radm Rudy K. Peschel, Chairman
Interagency Committee on
Search and Rescue
United States Coast Guard
2100 Second St., S.W.
Washington, DC 20593-0001

Charles J. Hinkle, Jr.
KSI, Inc.
7630 Little River Turnpike
Suite 212
Annadale, Virginia 22003

Mary E. Brooner
Manager, Wireless Regulatory Policies
Motorola, Inc.
1350 I Street, N.W., Suite 400
Washington, DC 20005

Lawrence R. Krevor
Director - Government Affairs
Nextel Communications, Inc.
800 Connecticut Avenue, N.W.
Suite 1001
Washington, DC 20006

Stephen L. Goodman
Counsel for
Northern Telecom, Inc.
Halprin, Temple, Goodman & Sugrue
1100 New York Avenue, N.W.
Suite 650, East Tower
Washington, DC 20005

R. Michael Senkowski
Jeffrey S. Linder
Stephen J. Rosen
Attorneys for Personal Communications
Industry Association
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

Mark J. Golden
Vice President of Industry Affairs
Personal Communications Industry
Association
500 Montgomery Street
Suite 700
Alexandria, VA 22314-1561

Richard D. Adams, President
Rural Cellular Association
2120 L Street, N.W.
Suite 520
Washington, DC 20037

Glen A. Glass, Vice President, General Counsel
& Secretary
Carol L. Tacker, General Attorney
Bruce E. Beard, Attorney
Southwestern Bell Mobile Systems, Inc.
17330 Preston Road, Suite 100A
Dallas, TX 75252

Jeffrey S. Bork
Attorney for
U S West, Inc.
1020 19th Street, N.W., Suite 700
Washington, DC 20036

Raymond G. Bender, Jr.
J.G. Harrington
Attorneys for
Vanguard Cellular Systems, Inc.
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, DC 20037